

Motion.

4. Furthermore, counsel is prepared to discuss with the court, *in camera*, the nature and substance of the basis that necessitated the submission of the within Motion.

5. Movant notified Defendants that Movant is filing a Motion for Permission to Withdraw as Counsel.


6. Moreover, Movant has taken reasonable steps to avoid foreseeable prejudice to the rights of Plaintiff, including, but not limited to, advising the client of the within filing.

WHEREFORE, Movant respectfully requests this Honorable Court permit them to withdraw their appearance, and enter the Order attached hereto.

Respectfully submitted,

Bogan Law Group, LLC

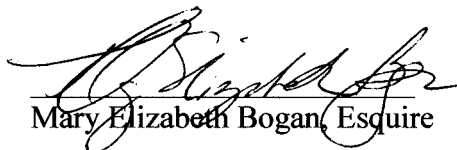
By:


Mary Elizabeth Bogan, Esquire
1800 John F. Kennedy, Suite 300
Philadelphia, PA 19103
(215) 385-5254
Attorney for Movant

VERIFICATION

Mary Elizabeth Bogan, Esquire, hereby makes this Verification; and states that the facts set forth in the foregoing Motion for Permission to Withdraw as Counsel are true and correct to the best of my knowledge, information and belief, subject to the penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities.

By:


Mary Elizabeth Bogan, Esquire

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PAIGE ROBBINS,

Plaintiff

vs.

**LOWER MERION SCHOOL
DISTRICT,**

And

**THE BOARD OF DIRECTORS
OF THE LOWER MERION
SCHOOL DISTRICT,**

And

CHRISTOPHER W. MCGINLEY,

Defendants.

CIVIL ACTION No.: 11-7495

CERTIFICATE OF SERVICE

I, Mary Elizabeth Bogan, Esquire, hereby certify that I caused a true and correct copy of the foregoing Motion for Permission to Withdraw As Counsel to be served as follows on December 13th, 2011:

Via Regular Mail

Paige Robbins
437 Hidden River Road
Penn Valley, PA 19072

Via Regular Mail

LOWER MERION SCHOOL
DISTRICT
301 East Montgomery Avenue
Ardmore, PA 19003

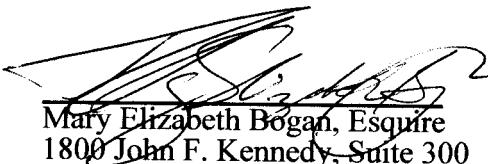
Via Regular Mail

Board of Directors of the LOWER MERION SCHOOL
DISTRICT
301 East Montgomery Avenue
Ardmore, PA 19003

Via Regular Mail

Christopher W. McGinley
Superintendent of LOWER MERION SCHOOL
DISTRICT
301 East Montgomery Avenue
Ardmore, PA 19003

By:



Mary Elizabeth Bogan, Esquire
1800 John F. Kennedy, Suite 300
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(215) 385-5254
Attorney for Movant